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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA :  
 :  
 v. : Mag. No. 21-5034 (LHG)  
 :  
 NEALEIGH GLASPER : **CRIMINAL COMPLAINT**

I, Justin Notarfrancesco, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

s/ Justin Notarfrancesco

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Justin Notarfrancesco, Special Agent  
Federal Bureau of Investigation

Attested to by telephone pursuant to  
Fed. R. Crim. P. 4.1(b)(2)(A)  
on August 24, 2021,  
in the District of New Jersey.



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Hon. Lois H. Goodman  
United States Magistrate Judge

**ATTACHMENT A**

(Impersonating an Officer or Employee of the United States)

On or about April 13, 2021, in Mercer County, in the District of New Jersey, the defendant,

NEALEIGH GLASPER,

did falsely assume and pretend to be an officer and employee acting under the authority of the United States and a department, agency, and officer thereof, and acted as such.

In violation of Title 18, United States Code, Section 912.

**ATTACHMENT B**

I, Justin Notarfrancesco, am a Special Agent of the Federal Bureau of Investigation (“FBI”). The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including statements made or reported by various witnesses with knowledge of relevant facts, my review of publicly available information, and my review of evidence, including body-worn camera video, business records, and other documents. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Late in the evening on April 13, 2021, officers of the Trenton Police Department observed that a black, 2018 Audi A8 (the “Vehicle”) was driving in a high-crime area of Trenton with heavily tinted windows in apparent violation of New Jersey state law. Thereafter, the officers conducted a motor vehicle stop of the Vehicle. The entire traffic stop was recorded by the officers’ body-worn cameras.

2. As the officers approached the Vehicle, they requested that the driver and passenger lower all four of the Vehicle’s tinted windows for the officers’ visibility and safety.

3. Upon lowering the Vehicle’s front and rear passenger windows, defendant NEALEIGH GLASPER immediately and repeatedly told the officers that she was an FBI special agent. Specifically, and among other things, GLASPER twice told the officers in a loud and clear voice, “I’m FBI.” Thereafter, GLASPER introduced herself to the officers as “Special Agent Glasper,” and stated that she “work[ed] cybersecurity in the Philly office.” Throughout the stop, GLASPER continued to hold herself out as an FBI special agent, stated multiple times that she worked for the federal government, and offered to provide her badge to the officers. The officers issued the driver a motor vehicle citation and the motor vehicle stop concluded.

4. Shortly thereafter, the officers returned to the area because GLASPER had reported that the driver of the Vehicle could not find his driver’s license and believed that the officers had not returned it at the conclusion of the motor vehicle stop. During that follow-up encounter with the same officers, GLASPER was wearing an empty gun holster on her right hip and ultimately advised the officers that she would call her “superior” to advise him or her of the misplaced license.

5. GLASPER is not, and never has been, an FBI special agent. Indeed, GLASPER is not, and never has been, employed by the FBI in any capacity.